



**NRA**  
**Political Victory Fund**

Institute for Legislative Action

11250 WAPLES MILL ROAD, FAIRFAX, VIRGINIA 22030

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JUN 11 11 14 AM '97

June 4, 1997

Federal Election Commission  
Reports Analysis Division  
Attn.: Monica Johnson  
999 E Street, NW  
Washington, D.C. 20463


Id. C00053553.  
RE: Independent Expenditures

Dear Ms. Johnson:

Your letters dated April 23, 1997, raised questions concerning our independent expenditures in support of Andrea Seastrand, Jim Ryun, Asa Hutchinson and Bob Barr. These expenditures qualify as "independent expenditures" as defined in 11 CFR §109.1(a). Further definition under 11 CFR §109.1(b)(4) was used to test the independence of the expenditures reported in the NRA Political Victory Fund's 12 Day Pre-General and 30 Day Post-General Reports.

After investigating our activity in relation to these candidates, we have determined that the expenditures in question qualify as "independent expenditures" and do not fall under the guidelines set forth in CFR §109.1(c). If you have any questions, please call me at (703) 267-1152.

Sincerely,



Ray Smith  
PVF Assistant Treasurer